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April 19, 2000

USDA-Forest Service, CAET  
Attn: UFP, Bldg 2, Suite 295  
5500 Amelia Earhart Drive  
Salt Lake City, UT 84116

Dear Sir or Madam:

In response to yet another deadline from your agency, thank you for allowing us to comment. There are several areas where we would like to direct our comments:

#### Coordination with other Agencies

It is important and imperative that all agencies coordinate and work together in resource management. Share data, manage in a similar fashion, most of all let the local resource managers decide how the local resources should be managed to benefit their communities.

#### Changing Management to a Watershed Basis

In theory and as a national direction, this is not a bad approach. On the other hand, if it turns into federal standards that dictate how the resources locally are to be managed, ignoring the input and expertise of local resource managers, it will not be a positive move.

#### Utilization of California's Assessment

This assessment was poorly done, using little on-the-ground scientific data. In instances, the watersheds are misplaced. It was developed as a means of categorization of watersheds for funding priorities, not as a means of regulation. Most of the watersheds and streams rightfully should have been placed into Category IV, "not enough information to classify". The agency didn't do that, because they obviously wanted to receive federal funds. In the instances where data did exist, 97% of the streams are in "good" or "fair" condition.

#### Watersheds of Special Protection

There is no authority for this designation in existing federal law. The USFS may assume additional regulatory authorities and this type of designation would trigger use restrictions and other changes within the entire watershed, even if only a part of it is on federal land.

Basically, the USFS is moving to a direction of federal control rather than local control. That isn't the right direction. Plenty of federal regulation already exists to protect the quality of our watersheds and to manage cooperatively, if that is what the agency truly wants to do. All you really need to do is step up to the plate and allow your local managers true negotiating power in deciding how local resources should be managed. That would be the best use of our money in your budget.

Sincerely,



Henry and Pam Giacomini  
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41363 Opdyke Lane  
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APR 24 2000

c: Wally Herger, Dianne Feinstein, Barbara Boxer